



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

March 28, 2007
(PBW Project No. 1352)

VIA ELECTRONIC MAIL

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Post-Analysis Sample Retention, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

As we discussed in a telephone conversation earlier today, it has recently come to my attention that the analytical laboratory subcontractor for the above-referenced Site, Gulf Coast Analytical Laboratories, Inc. (GCAL), has failed to retain many of the unused post-analysis sample portions or sample extracts/digestates as required by the approved Quality Assurance Project Plan (QAPP) for the Site. The attached letter from GCAL explains that these post-analysis sample portions were disposed in accordance with GCAL policy rather than being stored until written permission for disposal was provided by the Remedial Investigation (RI) Manager as specified in the QAPP. I have discussed this situation with GCAL, and as indicated in the attached letter, they are committed to retaining all future post-analysis samples from the Site until disposal has been authorized by Pastor, Behling & Wheeler, LLC. In accordance with Paragraph 52 of the modified Unilateral Administrative Order (UAO) for the Site, I certify that I have been fully authorized by LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto), to submit this information and to legally bind all Respondents thereto.

Thank you for your continued support on this project. Should you have any questions or comments regarding this information, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor, P.E.
Principal Engineer

Mr. Gary Miller
March 28, 2007
Page 2 of 2

cc: Ms. Barbara Nann – US Environmental Protection Agency
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

Eric Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

March 9, 2007

RE: Sample Disposal

Dear Eric:

Per your request, this letter addresses the sample disposal of any unused or left over portion of water, soil, waste, and tissue matrix after analyses from the Gulfco Project.

Unless pre-arranged with the client, it is GCAL's policy to dispose of any remaining sample from a project after analyses is complete and/or after approximately 60 days following sample receipt.

Per the Sampling and Analysis Plan- Volume II, Quality Assurance Project Plan Gulfco Marine Maintenance Superfund Site, Freeport, Texas dated March 14, 2006 authored by Pastor, Behling, & Wheeler (PBW), LLC section 3.4.1 page 22, Revision F-1 it is stated that :

After sample analysis the unused portion of the sample and sample extracts/digestates, together with all identifying labels will be stored until written permission to destroy the samples is given by the RI Manager.

Upon inquiry, it was discovered that most, if not all samples (excluding remaining tissue samples) have been disposed of per GCAL's policy stated above. This is inconsistent with the objective stated in the Sampling and Analysis Plan of PBW.

GCAL's management and staff are aware of the error and regret the disposal of any remaining sample portions after analyses without written consent from PBW.

Please be assured that GCAL will commit that all future Gulfco samples received for analyses will be retained until disposal has been authorized in writing by PBW.

Sincerely,



Ed Gallagher
Technical Sales